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October 15, 2019

VIA EMAIL

Nicolas A. Mitchell
Investigation Counsel
House Permanent Select Committee on Intelligence
Congress
Washington, D.C. 20515

Dear Mr. Mitchell:

I am writing on behalf of Mr. Rudolph W. Giuliani in response to the letter from Chairmen Schiff, Engel, and Cummings dated September 30, 2019, and the accompanying subpoena. Please accept this response as formal notice that Mr. Giuliani will not participate because this appears to be an unconstitutional, baseless, and illegitimate "impeachment inquiry." By way of this response, Mr. Giuliani adopts all the positions set forth in Mr. Cipollone's October 8, 2019 letter on behalf of President Donald J. Trump.

In addition, the subpoena is overbroad, unduly burdensome, and seeks documents beyond the scope of legitimate inquiry. Moreover, documents sought in the subpoena are protected by attorney-client, attorney work-product, and executive privileges.

Sincerely,

Jon A. Sale

Jon A. Sale
Counsel for Rudolph W. Giuliani